

DOCKET FILE COPY ORIGINAL
**Before the
Federal Communications Commission
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
ARCH COMMUNICATIONS GROUP, INC.) WT Docket No. 99-365
and PAGING NETWORK, INC.) File No. 0000053846, *et al.*
) DA 99-3028
For Consent to Transfer Control of Paging,)
Narrowband PCS, and Other Licenses)

To: Chief, Wireless Telecommunications Bureau

MOTION FOR EXTENSION OF TIME

Metrocall, Inc. ("Metrocall"), by its attorneys and pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46; hereby respectfully requests a brief, two-day extension of time, up to and including Wednesday, October 4, 2000, within which to file its Opposition to Paging Network, Inc.'s ("PageNet") Motion to Dismiss (the "Motion") Metrocall's Petition for Reconsideration or Informal Complaint (the "Petition") in the above-captioned proceeding.

Metrocall's counsel has orally notified PageNet's attorney¹ and the Commission's staff² of the filing of this Motion, as required by Section 1.46(c).

The Motion was filed with the Commission on Friday, September 22, 2000. As with the Opposition filed by Arch Communications Group, the Motion was apparently hand-delivered to Metrocall's attorneys' offices shortly after 6:00 p.m. on that date; however, it was not actually received by the attorneys until midday on Monday,

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¹ PageNet does not consent to the requested extension, and PageNet's attorney has indicated that PageNet may file an opposition to this Motion.

² A voicemail message has been left concerning this matter with a staff attorney familiar with this proceeding.

September 25, 2000. Although Metrocall's attorneys believed that, due to the difference in the length of the response period for oppositions to motions, they would be able to timely file an opposition despite the delay in their receipt of the Motion, it has not been possible to complete and finalize the pleading. Had the Motion been served by mail, it would most likely have been received by Metrocall's attorneys on Monday, September 25, 2000, and the deadline to respond would have been Thursday, October 5, 2000. This brief motion is necessary to allow Metrocall's counsel nearly the amount of time typically afforded by the FCC to file an opposition. Moreover, Metrocall has asked for an extension until Wednesday, October 4, 2000 to reply to Arch's Opposition to the Petition; a grant of the requested extension will result in the concurrent filing of the related pleadings.

The Commission has stated its "general philosophy" that its "procedural rules are often waived, so long as the orderliness [of a proceeding] is preserved." Service Broadcasting, Inc., 46 RR2d 413, 416 (1979). The requested extension will not disrupt the orderliness of this proceeding; a mere two days is requested, and the Opposition will be filed before the date that it would have been due had the Opposition been served by mail. There will be no prejudice to any party; the above-captioned transaction cannot be consummated unless and until the Bankruptcy Court confirms PageNet's plan of reorganization, and the confirmation hearing on that plan will not be held until October 26, 2000.

The Commission has a statutory mandate to consider all facts relevant to its ultimate public interest determination. WSTE-TV v. FCC, 566 F.2d 333, 337 (D.C. Cir. 1977); Dena Pictures, Inc., 46 RR2d 1583, 1584 (1980); Service Broadcasting, 46 RR2d

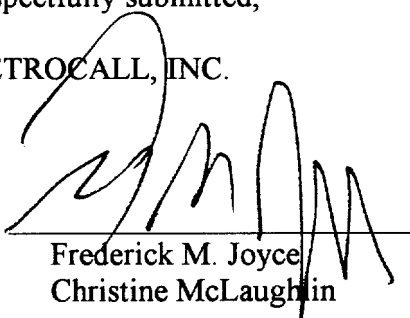
at 416, n.3. A grant of this Motion will allow Commission to have all relevant facts before it, to enable it to fulfill its mandate.

For all the foregoing reasons, Metrocall respectfully requests that the requested extension of time be granted.

Respectfully submitted,

METROCALL, INC.

By:



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October 2, 2000

CERTIFICATE OF SERVICE

I, Veronica Blakeney, a secretary with the law firm of Alston & Bird LLP, hereby certify that on the 2nd day of October, 2000, I caused to be served the foregoing Motion for Extension of Time by hand-delivery (unless otherwise noted), upon the following:

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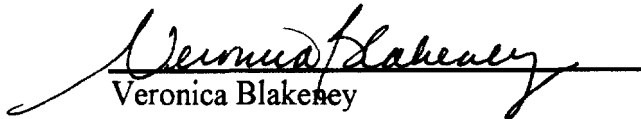
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